

Exhibit 1

Brian K. Reinbold Sr.

*3909 Delaware Street
Marshallton, DE 19808-5709
Phone (302) 683-9242
Cell (302) 753-4827
BKR0822@aol.com*

July 25, 2005

*Cohen, Weiss and Simon LLP
Attn: Oriana Vigliotti
330 West 42ND Street
New York, N.Y. 10036-6976*

*Re: Brian K Reinbold vs. NALC Branch 191 & USPS
US District Court Case # 05-47GMS*

Dear Ms. Vigliotti

*Please find attached the answer to you Interrogatories and Documents
request for NALC Branch 191 dated June 29, 2005.*

Sincerely,


Brian K Reinbold

*Sent via certified mail # 7004 1160 0006 3104 1758 w/return receipt
on July 26, 2005*

*Cc: USAG Patricia Hannigan
via certified mail# 7004 1160 0006 3104 1833 w/ return receipt
On July 26, 2005*

file

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DISTRICT OF DELAWARE
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Exhibit 1

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BRIAN K REINBOLD
Plaintiff,

vs.

Civil Action Number
~~05-047~~ GMS

NALC BRANCH 191 & USPS
Defendant

RESPONSE TO DEFENDANTS SET OF INTERROGATORIES
DATED JUNE 29, 2005

ANSWER TO QUESTION 1:

Keith Jordon
USPS Letter Carrier
Vice-President/Shop Steward NALC Local 191
Wilmington, DE

Bob Wilkerson
USPS Letter Carrier
NALC Local 191 President
Wilmington, DE

Chris Cambell
USPS Letter Carrier
Shop Steward NALC Local 191
Wilmington, DE

Jeff Cushner
USPS Letter Carrier
Shop Steward NALC Local 191
Wilmington, DE

Jim Surfey
NBA Rep. Region 13
NALC
Virginia Beach, VA

Exhibit 1

Dick Gentry
NBA Agent Region 13
NALC
Virginia Beach, VA

William Young
President NALC
Washington, DC

Tim Dowdy
NBA Agent Region 13
NALC
Virginia Beach, VA

Gary Mullins
Vice-President NALC
Washington, DC

Fred Rolando
Director of City Delivery NALC
Washington, DC

Kevin Burns
Carrier Supervisor USPS
Wilmington, DE

Jeff Cushner
Shop Steward NALC Local 191
Wilmington, DE

Vincent Sorbotto
President (RETIRED) NALC
Washington, DC

Yolanda Moore Hankerson
Branch Manager, Rodney Square
Wilmington, DE

Senator Joseph R Biden Jr.
For the State of Delaware
Wilmington, DE

Russell Olive Jr.
NALC Step B Representative
Bellmawr, NJ

Exhibit 1

Edward DiDomenico
USPS Step B Representative
Bellmawr, NJ

Rose King
Shop Steward NALC Local 191
Wilmington, DE

Kevin Martin
Shop Steward NALC Local 191
Wilmington, DE

Mike Margis
Shop Steward NALC Local 191
Wilmington, DE

Bob Lewis
Shop Steward NALC Local 191
Wilmington, DE

Denise Royster Simms
Carrier Supervisor USPS
Wilmington, DE

Ed Gonzalez
Carrier Supervisor USPS
Wilmington, DE

Ed Carpenter
Carrier Supervisor USPS
Wilmington, DE

Alexander Lazaroff
Eastern Area Vice-President
Pittsburgh, PA

Doug Shiflet
Postmaster
Wilmington, DE

Exhibit 2

Senator Tom Carper
For The State of Delaware
Wilmington, DE

Joanna Korker
District Manager South Jersey District
Bellmawr, NJ

Isaacce Morris
Labor Relations
New Castle, DE

Mike Brose
District Manager South Jersey District
Bellmawr, NJ

Dennis Money
Carrier Supervisor USPS
Wilmington, DE

Eileen Muzzi
Station Manager
Wilmington, DE

Frank Rendon
Carrier Supervisor USPS
Wilmington, DE

Greg Vandervear
USPS Rep.
Wilmington, DE

Rick Calpaldo
Carrier Supervisor USPS
Wilmington, DE

John Potter
Postmaster General
Washington, DC

Paul Spadaro
Shop Steward NALC Local 191
Wilmington, DE

Exhibit 1

Ken Borlin
Station Manager
Wilmington, DE

Steve Gerber
Carrier Supervisor USPS
Wilmington, DE

Carla Rodgers
Carrier Supervisor USPS
Wilmington, DE

All Letter Carriers
Employed at Lancaster Avenue
In 2004

All Mail Handlers and Clerks
Employed at Lancaster Avenue
In 2004

ANSWER TO QUESTION 2: PTF Letter Carrier January 2001-May 2001 Newark, DE
PTF Letter Carrier May 2001-December 2004 Wilmington, DE

ANSWER TO QUESTION 3: Grievances were not filed in timely manner, agreements between NALC & USPS were not honored by the USPS, notices from USPS for discipline referenced wrong grievances, Grievances were not appealed, NALC & USPS did not use facts and all information at Step B to render a decision, NALC & USPS chose to ignore all facts and all information at Step B to render a decision, NALC & USPS violated the National agreement between the two parties on a weekly and daily basis, NALC & USPS knowingly let harassment against my self continue with no regard

ANSWER TO QUESTION 4: October 27, 2004 for Failure to Follow Instructions

ANSWER TO QUESTION 5: loss of all back pay with pay raises, health insurance cost, seniority, vacation, sick leave and benefits from removal till case end

The above question were answered to the best of my ability.



Brian K Reinbold
Plaintiff
July 25, 2005

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BRIAN K. REINBOLD
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Civil Action Number
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NALC BRANCH 191 & USPS
Defendant

RESPONSE TO DEFENDANTS DOCUMENT REQUEST
DATED JUNE 29, 2005

Please find attached all documents that answer your request 1-7

**I believe I have supplied all documents in my possession
and have answered all request to the best of knowledge.**



Brian K Reinbold
Plaintiff
July 25, 2005

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BRIAN K REINBOLD
Plaintiff,

vs.

Civil Action Number
05-047 GMS

NALC BRANCH 191 & USPS
Defendant

NOTICE OF SERVICE

I herby state that a response to the above defendants for there Interrogatories and Document Request dated June 29,2005 was sent in a prepaid envelope And then certified with a return receipt certified # 7004 1160 0006 3104 1758 on July 26, 2005 to Cohen, Weiss and Simon LLP Mrs. Oriana Vigliotti 330 west 42nd Street, New York, NY 10036-6976



Brian K Reinbold
Plaintiff
July 25,2005

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UNITED STATES DISTRICT COURT
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BRIAN K REINBOLD

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NALC BRANCH 191 & USPS

Defendant

NOTICE OF SERVICE

**I herby state that a response to the above defendant NALC 191 for there
Interrogatories and Document Request dated June 29,2005 was sent to the USPS
attorney in a prepaid envelope**

**And then certified with a return receipt certified # 7004 1160 0006 3104 1833 on
July 26, 2005 to Attn: Patrica Hannigan US Attorney General 1007 Orange Street
Suite 700 P.O. Box 2046 Wilmington, DE 19899-2046**


Brian K Reinbold

Plaintiff

July 25,2005